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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

April 20, 2009

2009 APR 20 P 3:45

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Tracey L. Ligon, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 204623

RE: Pre-MUR 480

Sua Sponte Submission of Itinere North America, LLC. dated October 8, 2008

Dear Ms. Ligon:

We refer you to our submission to the Commission dated October 8, 2008 ("Report") that was submitted on behalf of our clients, Itinere North America, LLC, ("Itinere N.A.") a Maryland company, with offices at 6701 Democracy Boulevard, Suite 200, Bethesda, MD. 20817, its parent company, Itinere Infrastructure, LLC, a Delaware holding company with the same office address, and their upstream parent company, Itinere Infraestructuras, S.A. ("Itinere S.A."), with offices at Paseo de la Castellana 83-85, 28046 Madrid, Spain. The purpose of this letter is to inform the Commission of certain changes in the corporate ownership structure of the aforementioned companies and their local contact information. As explained below, these changes do not affect the substantive issues described in the referenced Report, nor the ability of the companies and their parent company to implement any remedial actions required by the Commission.

The Facts

As indicated in the Report, Itinere N.A. has been operating in the United States as the wholly owned subsidiary of Itinere Infrastructure, LLC, in time a wholly owned subsidiary of Itinere S.A., a Spanish company which was until recently part of the Grupo Sacyr Vallehermoso, S.A. ("Sacyr Group"), a publicly traded company with shares traded on various stock exchanges including Madrid, Barcelona, Valencia, Bilbao and Lisbon. The Sacyr Group is the top parent company in the Spanish conglomerate. On December 2, 2008, the Sacyr Group announced its decision to sell a substantial part of Itinere S.A. to Citigroup Infrastructure Investors (CII), a private equity fund. According to the agreement executed by and between Sacyr Group and CII, this sale is subject to some precedent conditions, mainly: 1) the obtaining of the necessary approvals for the transaction from the competent Authorities and 2) CII launching an IPO for the acquisition of the Itinere S.A.'s shares. After the sale is to be completed, Sacyr Group will remain owner of 27 of Itinere's current infrastructure concessions in 5 countries (Chile, Costa Rica, Ireland, Portugal and Spain) and will also retain its subsidiaries in the US. Following these changes, Sacyr Group will remain a leading global company in the management of infrastructure concessions.

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Therefore, to implement such agreement, Sacyr Group will acquire the assets of Itinere Infraestructuras S.A. in the United States and will become the sole and exclusive owner of all the rights and obligations of Itinere Infrastructure, LLC and its Maryland subsidiary Itinere NA. Accordingly, ownership of Itinere NA and Itinere Infrastructure, LLC will be transferred to Sacyr Group to carry out its activity in the United States. Additionally the name of both companies will be changed to Sacyr North America, LLC, a Maryland company and Sacyr Infrastructure, LLC, a Delaware holding company And their business address will also be changed to CSC-Lawyers Incorporating Service Company, 7 St. Paul Street, Suite 1660, Baltimore, MD 21202.

Also, regarding any communication in reference to this issue, please refer it, to the customary business address: Peckar & Abramson, P.C. 1133 21st Street, N.W. Washington, D.C. 20036

In light of the foregoing, Sacyr Group and the aforementioned companies will henceforth be fully responsible for addressing any and all issues which are described in the Report.

We look forward to hearing from you to resolve this matter and trust that these changes will be duly noted in the record.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. W. Thompson', with a stylized flourish at the end.

William W. Thompson, Esq.

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